

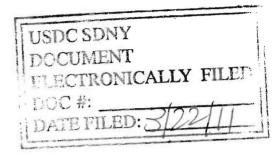
SHARMALAW

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March 21, 2011

Honorable Barbara S. Jones United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Room 17C New York, NY 10007-1312



RE: JFS FT LLC v. Kyosay Global, LLC, et al, No 11 CV 0972 (BSJ)

Dear Judge Jones:

I am counsel for plaintiff JFS FT LLC in the referenced action. On March 11, 2011, defendants (a) answered the complaint in part, (b) alleged a counterclaim, and (c) moved to dismiss portions of the complaint not answered. Plaintiff seeks an additional twenty one days to respond to the motion to dismiss, and an additional fourteen days to both answer the counterclaim and file an amended complaint as a matter of course so that all three submissions shall be due together by April 15, 2011.

- 1. Plaintiff's response to the motion to dismiss is currently due March 25, 2011.
- 2. However plaintiff, in part to dispel some of the arguments set forth in the motion to dismiss intends to file an amended complaint as a matter of course, which under Rule 15(a)(1)(B) is currently due April 1, 2011.
- 3. Plaintiff's answer to the counterclaim is currently due April 1, 2011.
- 4. Plaintiff has not made any previous request for an extension; and
- 5. Counsel for Defendants, Kysosay Global, LLC and Cameron Reid, has consented to this extension.

Plaintiff's respectfully request that its time to (i) respond to defendants' motion to dismiss, (ii) respond to defendants' counterclaim, and (iii) satisfy FRCP Rule 15(a)(1)(B) all be extended to April 15, 2011.

Very truly yours,

Ravi Ivan Sharma (RS2064)

SO ORDERED:

Hon. Barbara S. Jones

U.S.D.J.

Cc: Kevin Krantz, Esq.

* Such does not constitute consent to service by facsimile or email